



**FINAL ADMINISTRATIVE DECISION  
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Nilay Ghayal  
DOCKET NO.: 24-02656.001-R-1  
PARCEL NO.: 07-06-309-019

The parties of record before the Property Tax Appeal Board are Nilay Ghayal, the appellant, by James Pollard, Attorney at Law, in Lake Villa, and the Lake County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Lake** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$29,993  
**IMPR.:** \$158,132  
**TOTAL:** \$188,125

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Lake County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

**Findings of Fact**

The subject property consists of a two-story dwelling of frame and masonry exterior construction with 3,916 square feet of living area. The dwelling is approximately 24 years old. Features of the home include a 2,154 square foot basement of which 1,939 square feet are finished, 4 full bathrooms, central air conditioning, a fireplace, and a 620 square foot garage. The property has an approximately 18,404 square foot site and is located in Lake Villa, Warren Township, Lake County.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on three suggested equity comparables located in the same neighborhood code and from .06 to .22 of a mile from the subject. The comparables consist of two-story dwellings of frame exterior construction which are either 24 or 25 years old. The dwellings contain either 3,788 or 4,100 square feet of living area. The dwellings each have a basement of either 1,897 or 2,154 square feet of building

area none of which are reported to have any finished area, 3½ or 4 bathrooms, central air conditioning, one or two fireplaces, and a garage of either 619 or 640 square feet of building area. The comparables have improvement assessments ranging from \$148,760 to \$152,424 or from \$36.28 to \$40.24 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$143,890 or \$36.74 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$188,125. The subject property has an improvement assessment of \$158,132 or \$40.38 per square foot of living area.

In response to the appellant's evidence, the board of review, by a letter of the Warren Township Assessor, pointed out that appellant's comparable #1 has a smaller basement than the subject and only 1,707 square feet of finished basement area. Furthermore, appellant's comparables #2 and #3 each have fewer bathrooms than the subject and both lack any finished basement area.

In support of its contention of the correct assessment, the board of review submitted information on four suggested equity comparables along with property record cards. The properties are located in the same assessment neighborhood code and from .05 to .22 of a mile from the subject. The comparables consist of two-story dwellings of frame and masonry exterior construction which are 23 to 26 years old. The dwellings range in size from 3,611 to 3,709 square feet of living area. The dwellings each have a basement ranging in size from 1,724 to 1,885 square feet, where each comparable has finished basement areas ranging in size from 1,262 to 1,494 square feet. Features include 3½ to 4½ bathrooms, central air conditioning, a fireplace, and a garage ranging in size from 620 to 830 square feet of building area. The comparables have improvement assessments ranging from \$147,200 to \$152,012 or from \$39.69 to \$42.10 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of seven suggested equity comparables located in the same neighborhood code as the subject. The Board has given reduced weight to appellant's comparables #2 and #3, due to the lack of finished basement area as compared to the subject that has 1,939 square feet of basement finished area.

The Board finds the best evidence of assessment equity in the record consists of appellant's comparable #1 along with the board of review comparables, which are located within .22 of a

mile from the subject and consist of dwellings with similar story height, varying exterior construction types and ages of 23 to 26 years old as compared to the 24 year old subject. The dwellings range in size from 3,611 to 3,788 square feet of living area and thus necessitate adjustments to be more equivalent to the subject's dwelling size of 3,916 square feet. Likewise, each comparable has a basement ranging in size from 1,724 to 1,897 square feet of building area as compared to the subject's 2,154 square foot basement. Similarly, adjustments to each of these comparables is necessary for differences in finished basement area ranging from 1,262 to 1,494 square feet which are each inferior to the subject's finished area of 1,939 square feet. Adjustments are also necessary for differences in bathroom count to three of these best comparables and board of review comparable #2 has a larger garage than the subject necessitating an adjustment. These five best comparables in the record have improvement assessments ranging from \$147,200 to \$152,424 or from \$39.69 to \$42.10 per square foot of living area. The subject's improvement assessment of \$158,132 or \$40.38 per square foot of living area is above the range of the best comparables in the record in terms of overall improvement assessment and within the range on a per-square-foot of living area basis, which the Board finds to be logical given the subject's superior overall size, superior-sized basement and superior-sized finished basement area as compared to these best comparables in the record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject to make the comparables more similar to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: \_\_\_\_\_

November 25, 2025



Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Nilay Ghayal, by attorney:  
James Pollard  
Attorney at Law  
P.O. Box 3  
Lake Villa, IL 60046

COUNTY

Lake County Board of Review  
Lake County Courthouse  
18 North County Street, 7th Floor  
Waukegan, IL 60085